

Exhibit E

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

5:21-cv-844-XR

LULAC TEXAS, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,
Defendants.

1:21-cv-0786-XR

DECLARATION OF CHRISTOPHER D. DODGE

I, Christopher D. Dodge, declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.

2. I am a Counsel at Elias Law Group LLP in Washington, D.C. I am a member of the bar in the State of New York, the Commonwealth of Massachusetts, and the District of Columbia.

I am counsel to Plaintiffs Texas LULAC, Texas AFT, Texas Alliance for Retired Americans, and Voto Latino (collectively “LULAC Plaintiffs”) in this matter.

3. I make this declaration in support of the LULAC Plaintiffs’ response in opposition to the motion for summary judgment filed by Defendant Intervenors Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee at ECF No. 608.

4. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would competently testify to the best of my knowledge to the matters set forth below.

5. A true and correct excerpt of Dr. Allan J. Lichtman’s February 28, 2022 expert report is attached hereto as Exhibit E, Appendix 1.

6. A true and correct excerpt of Texas Director of Elections Keith Ingram’s May 6, 2022 Rule 30(b)(6) deposition transcript is attached hereto as Exhibit E, Appendix 2.

7. A true and correct excerpt of Texas Director of Elections Keith Ingram’s April 26, 2022 Rule 30(b)(6) deposition transcript is attached hereto as Exhibit E, Appendix 3.

8. A true and correct excerpt of the Secretary of State’s May 2, 2022 Objections and Responses to the United States’ Second Set of Interrogatories is attached hereto as Exhibit E, Appendix 4.

9. A true and correct copy of the Attorney General’s May 11, 2022 Verification of the State Defendants’ May 2, 2022 Objections and Responses to the United States’ Second Set of Interrogatories is attached hereto as Exhibit E, Appendix 5.

10. A true and correct excerpt of Defendant Jacquelyn Callanen’s April 20, 2022 Rule 30(b)(6) deposition transcript is attached hereto as Exhibit E, Appendix 6.

11. A true and correct copy of Defendant El Paso County Elections Administrator Lisa Wise's March 31, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories is attached hereto as Exhibit E, Appendix 7.

12. A true and correct copy of Defendant Dyana Limon-Mercado's March 23, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories is attached hereto as Exhibit E, Appendix 8.

13. A true and correct excerpt of Defendant Yvonne Ramon's May 10, 2022 Rule 30(b)(6) deposition transcript is attached hereto as Exhibit E, Appendix 9.

14. A true and correct excerpt of Defendant Michael Scarpello's April 29, 2022 Rule 30(b)(6) deposition transcript is attached hereto as Exhibit E, Appendix 10.

15. A true and correct excerpt of Plaintiff Texas AFT's April 28, 2023 Second Supplemental Responses and Objections to State Defendants' First Set of Interrogatories is attached hereto as Exhibit E, Appendix 11.

16. A true and correct excerpt of Plaintiff LULAC's April 28, 2023 Second Supplemental Responses and Objections to State Defendants' First Set of Interrogatories is attached hereto as Exhibit E, Appendix 12.

17. A true and correct excerpt of Defendant Bexar County Election Administrator Jacquelyn Callanen's March 17, 2023 Objections and Responses to LULAC Plaintiffs' Third Set of Interrogatories is attached hereto as Exhibit E, Appendix 13.

18. A true and correct excerpt of Dr. Henry Flores's February 28, 2022 expert report is attached hereto as Exhibit E, Appendix 14.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 23, 2023 in Washington, D.C.

/s/ Christopher D. Dodge
Christopher D. Dodge